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ATTORNEYS FOR FROST BANK

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

KYLE MARK LAWRENCE,	§	
Appellant,	§	
	§	
v.	§	CIVIL CASE NO. 3:19-cv-01843-X
	§	
FROST BANK,	§	
Appellee.	§	

**APPELLEE FROST BANK'S OBJECTION TO APPELLANT'S SECOND MOTION
FOR LEAVE TO SUPPLEMENT RECORD**

TO THE HONORABLE U.S. DISTRICT COURT:

Appellee Frost Bank ("Frost Bank"), files its Objection to Appellant's Second Motion for Leave to Supplement Record (the "Second Motion"), as follows:

1. Frost Bank objects to the inclusion of the Initial Disclosure Pursuant to Bankruptcy Rule 7026(a)(1) of Plaintiff Frost Bank ("Disclosures"). The Disclosures were not filed with the U.S. Bankruptcy Court and were not admitted into evidence at trial by the U.S. Bankruptcy Court. The Disclosures are not part of the trial record.

2. Appellant has failed to show this Court where he filed any objection or motion or trial exhibit, with the U.S. Bankruptcy Court, regarding the Disclosures.

3. The Disclosures were not timely designated by Appellant to be included in the appellate record.

WHEREFORE, Frost Bank respectfully requests that this Court sustain Frost Bank's objections and deny the Second Motion with respect to the inclusion of the Disclosures.

Respectfully submitted,

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By: /s/ Chad Berry
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was forwarded electronically to Defendant, by and through his counsel of record, via ECF, on the 6th day of November 2019.

Greg Mitchell
The Mitchell Law Firm, L.P.
12720 Hillcrest Road, Ste. 625
Dallas, TX 75230

/s/ Chad Berry
Chad Berry